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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

CELESTE BARRAS,)	
)	
Plaintiff,)	
)	
v.)	
)	
HEALTHSOUTH MEDICAL CLINICS OF)		
ANCHORAGE, LLC & U.S.)	
HEALTHWORKS HOLDING CO., INC.,)		
)	
Defendants.)	
_____)	Case No. A05-0174-CV (JWS)

**DEFENDANTS' MOTION TO COMPEL PRODUCTION OF
FRCP 26 DISCLOSURES AND TO IMPOSE SANCTIONS**

Defendants HealthSouth Medical Clinics of Anchorage, LLC ("HealthSouth") and U.S. Healthworks Holding Co., Inc. ("U.S. Healthworks") (collectively "Defendants"), by and through counsel of record, hereby file this motion to compel plaintiff Celeste Barras ("Barras") to produce her FRCP 26(a) Initial Disclosures and for the imposition of sanctions upon Barras for discovery violations. The undersigned counsel certifies that she has made

a good faith effort to informally secure compliance prior to bringing this motion but has been unable to do so.

This motion is made pursuant to Federal Civil Rules 37(a) and D. Ak. LR 37.1(a)-(b) and is supported by the accompanying memorandum, affidavit and proposed order for the Court.

DATED at Anchorage, Alaska, this ____ day of April 2006.

TURNER & MEDE, P.C.
Attorneys for defendants
HealthSouth Medical Clinics of
Anchorage, LLC and U.S.
Healthworks Holding Co., Inc.

By: _____
Patricia A. Vecera
Alaska Bar No. 9411111

Certificate of Service

This is to certify that on this ____ day of April 2006, a true and correct copy of the foregoing was mailed, postage prepaid, to:

Kenneth P. Jacobus
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